

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division

AMAZON.COM, INC. and AMAZON  
DATA SERVICES, INC.,

Plaintiffs

v.

WDC HOLDINGS LLC dba NORTHSTAR  
COMMERCIAL PARTNERS; BRIAN  
WATSON; STERLING NCP FF, LLC;  
MANASSAS NCP FF, LLC; NSIPI  
ADMINISTRATIVE MANAGER; NOVA  
WPC LLC; WHITE PEAKS CAPITAL  
LLC; VILLANOVA TRUST; CARLETON  
NELSON; CASEY KIRSCHNER;  
ALLCORE DEVELOPMENT LLC;  
FINBRIT HOLDINGS LLC; CHESHIRE  
VENTURES LLC; 2010 IRREVOCABLE  
TRUST; SIGMA REGENERATIVE  
SOLUTIONS LLC; CTBSRM, INC.;  
RODNEY ATHERTON; DEMETRIUS  
VON LACEY; RENRETS LLC,

Defendants.

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800 HOYT LLC,

Intervening Interpleader  
Plaintiff, Intervening  
Interpleader Counter-Defendant,

v.

BRIAN WATSON; WDC HOLDINGS, LLC;  
BW HOLDINGS; LLC,

Interpleader Defendants,

and

AMAZON.COM, INC., and AMAZON DATA  
SERVICES, INC.,

Interpleader Defendants,  
Interpleader Counter-Plaintiffs.

Case No. 1:20-CV-484 (RDA/TCB)

**DEFENDANT RENRETS, LLC'S  
SECOND AMENDED ANSWER TO  
PLAINTIFFS' THIRD AMENDED  
COMPLAINT**

Defendant Renrets, LLC (“Renrets”), by counsel, for its Second Amended Answer to Plaintiffs’ Third Amended Complaint, states as follows:

**PRELIMINARY STATEMENT**

1. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

2. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

3. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

4. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

5. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

6. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

7. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

## PARTIES

8. Renrets admits that Amazon is a Delaware corporation headquartered at 410 Terry Avenue North, Seattle, WA, 98109. Renrets is without sufficient knowledge to form a belief as to the truth of the remaining allegations contained in this paragraph, and therefore the allegations are deemed denied.

9. Renrets admits that Amazon Data Services, Inc. is a subsidiary of Amazon and is a Delaware corporation headquartered at 410 Terry Avenue North, Seattle, WA, 98109. Renrets is without sufficient knowledge to form a belief as to the truth of the remaining allegations contained in this paragraph, and therefore the allegations are deemed denied.

10. Renrets admits that the cited document purports to show that Northstar was headquartered in Denver, Colorado. Renrets is without sufficient knowledge to form a belief as to the truth of the remaining allegations contained in this paragraph, and therefore the allegations are deemed denied.

11. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

12. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

13. Admitted.

14. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

15. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

16. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

17. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

18. Renrets admits that Carleton Nelson is a former Real Estate Transaction Manager for Amazon. Renrets is without sufficient knowledge to form a belief as to the truth of the remaining allegations contained in this paragraph, and therefore the allegations are deemed denied.

19. Admitted.

20. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

21. Renrets admits that Rodney Atherton is a Colorado-licensed attorney purporting to do business through the firm Ergo Law at 6870 W. 52<sup>nd</sup> Avenue, Suite 203, Arvada, Colorado 80002. Renrets is without sufficient knowledge to form a belief as to the truth of the remaining allegations contained in this paragraph, and therefore the allegations are deemed denied.

22. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

23. Admitted.

24. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

25. Admitted.

26. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

27. Admitted.

28. Admitted.

29. Admitted.

30. Admitted.

31. Admitted.

32. Admitted.

33. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

34. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

35. Admitted.

36. Admitted.

37. Admitted.

38. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

39. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations regarding Mr. Nelson's leaving Amazon. Renrets admits the remaining allegations in this paragraph.

40. Admitted.

41. Admitted.

42. Admitted.

43. Admitted.

44. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

45. Admitted.

46. Admitted.

47. Admitted.

48. Denied.

49. Admitted.

50. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

51. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

52. Admitted.

53. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

54. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

## **SUBJECT MATTER JURISDICTION AND VENUE**

55. This paragraph contains conclusion of law to which no response is required. To the extent an answer is required, those conclusions are denied.

56. This paragraph contains conclusion of law to which no response is required. To the extent an answer is required, those conclusions are denied.

57. This paragraph contains conclusion of law to which no response is required. To the extent an answer is required, those conclusions are denied.

58. This paragraph contains conclusion of law to which no response is required. To the extent an answer is required, those conclusions are denied.

59. This paragraph contains conclusion of law to which no response is required. To the extent an answer is required, those conclusions are denied.

## **PERSONAL JURISDICTION**

60. This paragraph contains conclusion of law to which no response is required. To the extent an answer is required, those conclusions are denied.

61. This paragraph contains conclusion of law to which no response is required. To the extent an answer is required, those conclusions are denied.

## **FACTUAL ALLEGATIONS**

62. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

63. Renrets admits that the partially quoted language in this paragraph is contained in the document cited but denies the characterization of the language.

Renrets is without sufficient knowledge to form a belief as to the truth of the remaining allegations contained in this paragraph, and therefore the allegations are deemed denied.

64. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

65. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

66. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

67. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

68. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

69. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

70. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

71. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

72. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

73. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

74. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

75. Renrets admits that Mr. Nelson had responsibilities concerning real estate transactions in the Americas. Renrets is without sufficient knowledge to form a belief as to the truth of the remaining allegations contained in this paragraph, and therefore the allegations are deemed denied.

76. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

77. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

78. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

79. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

80. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

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82. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

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84. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

85. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

86. Renrets admits that the partially quoted language in this paragraph is contained in the document cited. Renrets is without sufficient knowledge to form a belief as to the truth of the remaining allegations contained in this paragraph, and therefore the allegations are deemed denied.

87. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

88. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

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94. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

95. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

96. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

97. Renrets admits that the partially quoted language in this paragraph is contained in the document cited. Renrets is without sufficient knowledge to form a belief as to the truth of the remaining allegations contained in this paragraph, and therefore the allegations are deemed denied.

98. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

99. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

100. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

101. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

102. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

103. Renrets admits that the partially quoted language in this paragraph is contained in the document cited. Renrets is without sufficient knowledge to form a belief as to the truth of the remaining allegations contained in this paragraph, and therefore the allegations are deemed denied.

104. Renrets admits that the document cited shows that Amazon sent Northstar a Request for Proposal. Renrets is without sufficient knowledge to form a

belief as to the truth of the remaining allegations contained in this paragraph, and therefore the allegations are deemed denied.

105. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

106. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

107. Renrets admits that the partially quoted language in this paragraph is contained in the document cited but denies the characterization of the language. Renrets is without sufficient knowledge to form a belief as to the truth of the remaining allegations contained in this paragraph, and therefore the allegations are deemed denied.

108. Renrets admits that the partially quoted language in this paragraph and a warranty clause are contained in the document cited but denies the characterization of the language. Renrets is without sufficient knowledge to form a belief as to the truth of the remaining allegations contained in this paragraph, and therefore the allegations are deemed denied.

109. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

110. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

111. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

112. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

113. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

114. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

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118. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

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121. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

122. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

123. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

124. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

125. Renrets admits that IPI is not named as a defendant in this action; as to the remainder of the paragraph, Renrets is without sufficient knowledge to form a belief as to the truth of the allegations, and therefore the allegations are deemed denied.

126. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

127. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

128. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

129. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

130. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

131. Renrets admits the document cited in footnote 2 purports to show that Dulles NCP, LLC was formed in Delaware. Renrets further admits that the document cited in footnotes 3, 4, and 5 purports to show several lease transactions and that Quail Ridge NCP, LLC was incorporated on January 17, 2018, Manassas NCP LLC was incorporated on May 16, 2018, and Dulles NCP II, LLC was incorporated on June 6, 2018. Renrets is without sufficient knowledge to form a belief as to the truth of the remaining allegations contained in this paragraph, and therefore the allegations are deemed denied.

132. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

133. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

134. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

135. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

136. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

137. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

138. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

139. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

140. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

141. Renrets admits that the partially quoted language in this paragraph is contained in the document cited but denies the characterization of the language. Renrets is without sufficient knowledge to form a belief as to the truth of the remaining allegations contained in this paragraph, and therefore the allegations are deemed denied.

142. Renrets admits that the partially quoted language in this paragraph is contained in the document cited but denies the characterization of the language.

Renrets is without sufficient knowledge to form a belief as to the truth of the remaining allegations contained in this paragraph, and therefore the allegations are deemed denied.

143. Renrets admits that the partially quoted language in this paragraph is contained in the document cited but denies the characterization of the language. Renrets is without sufficient knowledge to form a belief as to the truth of the remaining allegations contained in this paragraph, and therefore the allegations are deemed denied.

144. Renrets admits that the partially quoted language in this paragraph is contained in the document cited. Renrets is without sufficient knowledge to form a belief as to the truth of the remaining allegations contained in this paragraph, and therefore the allegations are deemed denied.

145. Renrets admits that the partially quoted language in this paragraph is contained in the document cited. Renrets is without sufficient knowledge to form a belief as to the truth of the remaining allegations contained in this paragraph, and therefore the allegations are deemed denied.

146. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

147. Renrets admits that the Lease Agreements prohibit bribes. Renrets is without sufficient knowledge to form a belief as to the truth of the remaining

allegations contained in this paragraph, and therefore the allegations are deemed denied.

148. Renrets admits that the partially quoted language in this paragraph is contained in the document cited. Renrets is without sufficient knowledge to form a belief as to the truth of the remaining allegations contained in this paragraph, and therefore the allegations are deemed denied.

149. Renrets admits that the partially quoted language in this paragraph is contained in the document cited. Renrets is without sufficient knowledge to form a belief as to the truth of the remaining allegations contained in this paragraph, and therefore the allegations are deemed denied.

150. Renrets admits that the partially quoted language in this paragraph is contained in the document cited. Renrets is without sufficient knowledge to form a belief as to the truth of the remaining allegations contained in this paragraph, and therefore the allegations are deemed denied.

151. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

152. Renrets admits that the partially quoted language in this paragraph is contained in the document cited but denies the characterization of the language. Renrets is without sufficient knowledge to form a belief as to the truth of the remaining allegations contained in this paragraph, and therefore the allegations are deemed denied.

153. Renrets admits that Mr. Watson's purported signature appears in the document cited in this paragraph. Renrets is without sufficient knowledge to form a belief as to the truth of the remaining allegations contained in this paragraph, and therefore the allegations are deemed denied.

154. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

155. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

156. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

157. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

158. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

159. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

160. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

161. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

162. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

163. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

164. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

165. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

166. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

167. Renrets admits this paragraph accurately describes the cited document but does not have knowledge as to the document's accuracy or veracity. Accordingly, Renrets is without sufficient knowledge to form a belief as to the truth of any of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

168. Renrets admits this paragraph accurately describes the cited document but does not have knowledge as to the document's accuracy or veracity. Accordingly, Renrets is without sufficient knowledge to form a belief as to the truth of any of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

169. Renrets admits this paragraph accurately describes the cited document but does not have knowledge as to the document's accuracy or veracity. Accordingly, Renrets is without sufficient knowledge to form a belief as to the truth of any of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

170. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

171. Renrets admits this paragraph accurately describes the cited document but does not have knowledge as to the document's accuracy or veracity. Accordingly, Renrets is without sufficient knowledge to form a belief as to the truth of any of the

allegations contained in this paragraph, and therefore the allegations are deemed denied.

172. Renrets admits this paragraph accurately describes the cited document but does not have knowledge as to the document's accuracy or veracity. Accordingly, Renrets is without sufficient knowledge to form a belief as to the truth of any of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

173. Renrets admits this paragraph accurately describes the cited document but does not have knowledge as to the document's accuracy or veracity. Accordingly, Renrets is without sufficient knowledge to form a belief as to the truth of any of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

174. Renrets admits this paragraph accurately describes the cited document but does not have knowledge as to the document's accuracy or veracity. Accordingly, Renrets is without sufficient knowledge to form a belief as to the truth of any of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

175. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

176. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

177. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

178. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

179. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

180. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

181. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

182. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

183. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

184. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

185. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

186. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

187. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

188. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

189. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

190. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

191. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

192. Renrets admits that this purported document exists. Renrets is without sufficient knowledge to form a belief as to the truth of the remaining allegations contained in this paragraph, and therefore the allegations are deemed denied.

193. Renrets admits that this purported document exists. Renrets is without sufficient knowledge to form a belief as to the truth of the remaining allegations contained in this paragraph, and therefore the allegations are deemed denied.

194. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

195. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

196. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

197. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

198. Renrets denies the allegations contained in this paragraph as to Renrets. Regarding the remaining allegations contained in this paragraph, Renrets is without sufficient knowledge to form a belief as to the truth of the allegations, and therefore the allegations are deemed denied.

199. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

200. Renrets admits Mr. Atherton is an attorney barred in Colorado who was previously suspended from the practice of law due to the purported violations of the Colorado Rules of Professional Conduct. Renrets further admits that the cited documents purport to show that Mr. Atherton had bank accounts subject to forfeiture. Renrets is without sufficient knowledge to form a belief as to the truth of the remaining allegations contained in this paragraph, and therefore the allegations are deemed denied.

201. Renrets admits that the partially quoted language in this paragraph is contained in the document cited but denies the characterization of the language. Renrets is without sufficient knowledge to form a belief as to the truth of the remaining allegations contained in this paragraph, and therefore the allegations are deemed denied.

202. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

203. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

204. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

205. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

206. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

207. Renrets admits that the partially quoted language in this paragraph is contained in the document cited but denies the characterization of the language. Renrets is without sufficient knowledge to form a belief as to the truth of the remaining allegations contained in this paragraph, and therefore the allegations are deemed denied.

208. Renrets admits that the partially quoted language in this paragraph is contained in the document cited but denies the characterization of the language.

Renrets further admits that the United States filed a forfeiture action. Renrets is without sufficient knowledge to form a belief as to the truth of the remaining allegations contained in this paragraph, and therefore the allegations are deemed denied.

209. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

210. Renrets admits that the partially quoted language in this paragraph is contained in the document cited but denies the characterization of the language. Renrets is without sufficient knowledge to form a belief as to the truth of the remaining allegations contained in this paragraph, and therefore the allegations are deemed denied.

211. Renrets admits that the partially quoted language in this paragraph is contained in the document cited but denies the characterization of the language. Renrets is without sufficient knowledge to form a belief as to the truth of the remaining allegations contained in this paragraph, and therefore the allegations are deemed denied.

212. Renrets admits that the partially quoted language in this paragraph is contained in the document cited but denies the characterization of the language. Renrets is without sufficient knowledge to form a belief as to the truth of the remaining allegations contained in this paragraph, and therefore the allegations are deemed denied.

213. Renrets admits that the partially quoted language in this paragraph is contained in the document cited but denies the characterization of the language. Renrets is without sufficient knowledge to form a belief as to the truth of the remaining allegations contained in this paragraph, and therefore the allegations are deemed denied.

214. Renrets admits that the language in this paragraph is contained in the document cited but denies the characterization of the language. Renrets is without sufficient knowledge to form a belief as to the truth of the remaining allegations contained in this paragraph, and therefore the allegations are deemed denied.

215. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

216. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

217. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

218. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

219. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

220. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

221. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

222. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

223. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

224. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

225. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

226. Renrets admits that the partially quoted language in this paragraph and its related subparts is contained in the documents cited but denies the characterization of the language. Renrets is without sufficient knowledge to form a belief as to the truth of the remaining allegations contained in this paragraph and its subparts, and therefore the allegations are deemed denied.

227. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

228. Renrets admits that the partially quoted language in this paragraph is contained in the document cited but denies the characterization of the language. Renrets is without sufficient knowledge to form a belief as to the truth of the remaining allegations contained in this paragraph, and therefore the allegations are deemed denied.

229. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

230. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

231. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

232. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

233. Renrets admits that the partially quoted language in this paragraph is contained in the document cited but denies the characterization of the language. Renrets is without sufficient knowledge to form a belief as to the truth of the remaining allegations contained in this paragraph, and therefore the allegations are deemed denied.

234. Renrets admits that the partially quoted language in this paragraph is contained in the document cited but denies the characterization of the language. Renrets is without sufficient knowledge to form a belief as to the truth of the remaining allegations contained in this paragraph, and therefore the allegations are deemed denied.

235. Renrets admits that the partially quoted language in this paragraph is contained in the document cited but denies the characterization of the language. Renrets is without sufficient knowledge to form a belief as to the truth of the remaining allegations contained in this paragraph, and therefore the allegations are deemed denied.

236. Renrets admits that the partially quoted language in this paragraph is contained in the document cited but denies the characterization of the language. Renrets is without sufficient knowledge to form a belief as to the truth of the

remaining allegations contained in this paragraph, and therefore the allegations are deemed denied.

237. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

238. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

239. Renrets admits that the partially quoted language in this paragraph is contained in the document cited but denies the characterization of the language. Renrets is without sufficient knowledge to form a belief as to the truth of the remaining allegations contained in this paragraph, and therefore the allegations are deemed denied.

240. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

241. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

242. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

243. Renrets admits that the partially quoted language in this paragraph is contained in the document cited. Renrets is without sufficient knowledge to form a belief as to the truth of the remaining allegations contained in this paragraph, and therefore the allegations are deemed denied.

244. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

245. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

246. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

247. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

248. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

249. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

250. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

251. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations regarding Mr. Nelson's leaving Amazon. Renrets admits the remaining allegations in this paragraph.

252. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

253. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

254. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

255. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

256. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

257. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

258. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

259. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

260. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

261. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

262. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

263. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

264. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

265. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

266. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

267. To the extent the allegations contained in this paragraph relate to Renrets, those allegations are denied as to Renrets. To the extent the allegations in this paragraph relate to other persons or entities, Renrets is without sufficient knowledge to form a belief as to the truth of the allegations, and therefore the allegations are deemed denied.

268. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

269. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

270. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

271. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

272. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

273. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

274. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

275. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

276. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

277. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

278. Renrets admits that the partially quoted language in this paragraph is contained in the document cited but denies the characterization of the language. Renrets is without sufficient knowledge to form a belief as to the truth of the remaining allegations contained in this paragraph, and therefore the allegations are deemed denied.

279. Renrets admits that the partially quoted language in this paragraph is contained in the document cited but denies the characterization of the language. Renrets is without sufficient knowledge to form a belief as to the truth of the remaining allegations contained in this paragraph, and therefore the allegations are deemed denied.

280. Renrets admits that the partially quoted language in this paragraph is contained in the document cited but denies the characterization of the language. Renrets is without sufficient knowledge to form a belief as to the truth of the remaining allegations contained in this paragraph, and therefore the allegations are deemed denied.

281. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

282. Renrets admits that the partially quoted language in this paragraph is contained in the document cited but denies the characterization of the language. Renrets is without sufficient knowledge to form a belief as to the truth of the remaining allegations contained in this paragraph, and therefore the allegations are deemed denied.

283. Renrets admits that the partially quoted language in this paragraph is contained in the document cited but denies the characterization of the language. Renrets is without sufficient knowledge to form a belief as to the truth of the remaining allegations contained in this paragraph, and therefore the allegations are deemed denied.

284. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

285. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

286. This paragraph contains conclusions of law to which no response is required. To the extent an answer is required, those conclusions are denied.

287. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

288. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

289. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

290. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

291. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

292. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

293. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

294. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

295. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

296. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

297. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

298. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

299. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

300. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

301. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

302. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

303. Renrets admits that the partially quoted language in this paragraph is contained in the document cited. Renrets is without sufficient knowledge to form a belief as to the truth of the remaining allegations contained in this paragraph, and therefore the allegations are deemed denied.

304. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

305. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

306. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

307. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

308. Renrets admits that the partially quoted language in this paragraph is contained in the document they cited but denies the characterization of them. Renrets is without sufficient knowledge to form a belief as to the truth of the remaining

allegations contained in this paragraph, and therefore the allegations are deemed denied.

309. To the extent the allegations contained in this paragraph relate to Renrets, those allegations are denied as to Renrets. To the extent the allegations in this paragraph relate to other persons or entities, Renrets is without sufficient knowledge to form a belief as to the truth of the allegations, and therefore the allegations are deemed denied. As to the subparts of this paragraph:

- i. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this subpart, and therefore the allegations are deemed denied.
- ii. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this subpart, and therefore the allegations are deemed denied.
- iii. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this subpart, and therefore the allegations are deemed denied.
- iv. To the extent the allegations contained in this paragraph relate to Renrets, those allegations are denied as to Renrets. To the extent the allegations in this paragraph relate to other persons or entities, Renrets is without sufficient knowledge to form a belief as to the truth of the allegations, and therefore the allegations are deemed denied. Renrets admits, however, that, on advice of counsel, Mr. Atherton, it wired

monies to Mr. Nelson. Renrets further admits that it was established in May 2017 by James M. Sterner, who is Mr. Nelson's father-in-law and that James M. Sterner is the LLC's sole member. As to the footnote contained in this subpart, Plaintiffs cite to Dkt. 1, ¶ 36 in support of these allegations, however, Dkt. 1, ¶ 36 does not contain these allegations. Accordingly, Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this footnote, and therefore the allegations are deemed denied.

- v. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this subpart, and therefore the allegations are deemed denied.
- vi. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this subpart, and therefore the allegations are deemed denied.
- vii. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this subpart, and therefore the allegations are deemed denied.
- viii. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this subpart, and therefore the allegations are deemed denied.

310. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

311. To the extent the allegations contained in this paragraph relate to Renrets, those allegations are denied as to Renrets. To the extent the allegations in this paragraph relate to other persons or entities, Renrets is without sufficient knowledge to form a belief as to the truth of the allegations, and therefore the allegations are deemed denied. As to the subparts of this paragraph:

i. Renrets denies any illicit activity as to Renrets. Renrets is unaware of which extract the Third Amended Complaint references. Renrets admits that it obtained a promissory note from CTBSRM, the value of which would not exceed \$5,000,000, and agreed to pay the promissory note, with interest, by September 1, 2019.

ii. Renrets denies any illicit activity as to Renrets. Renrets admits that Mr. Nelson provided interrogatory responses on March 25, 2022. Renrets further admits that the partially quoted language in this paragraph is contained in the document cited, and that on advice from counsel, Mr. Atherton, Mr. Nelson received money from Renrets, which received money from CTBSRM via an executed promissory note. As to the footnote contained in this subpart, Renrets admits that the partially quoted language in this footnote is contained in the document cited. Renrets timely paid interest on the promissory note. As to the remaining allegations in the footnote, Renrets is without sufficient knowledge

to form a belief as to the truth of the allegations, and therefore the allegations are deemed denied.

iii. Renrets is without sufficient knowledge to form a belief as to the truth of whether Mr. Nelson produced an email from August 19, 2019, in discovery, as alleged in this subpart. Renrets admits, however, that on advice from counsel, Mr. Atherton, it received monies from CTBSRM.

312. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

313. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

314. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

315. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

316. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

317. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

318. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

319. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

320. Renrets admits that the signature block contained in this paragraph appears in the documents cited. Renrets is without sufficient knowledge to form a belief as to the truth of the remaining allegations contained in this paragraph, and therefore the allegations are deemed denied

321. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

322. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

323. Renrets admits that the partially quoted language in this paragraph is contained in the document cited but denies the characterization of the language. Renrets is without sufficient knowledge to form a belief as to the truth of the

remaining allegations contained in this paragraph, and therefore the allegations are deemed denied.

324. Renrets admits that the partially quoted language in this paragraph is contained in the document cited but denies the characterization of the language. Renrets is without sufficient knowledge to form a belief as to the truth of the remaining allegations contained in this paragraph, and therefore the allegations are deemed denied.

325. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

326. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

327. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

328. Renrets admits that the partially quoted language in this paragraph is contained in the document cited. Renrets is without sufficient knowledge to form a belief as to the truth of the remaining allegations contained in this paragraph, and therefore the allegations are deemed denied.

329. Renrets admits that the partially quoted language in this paragraph is contained in the document cited. Renrets is without sufficient knowledge to form a

belief as to the truth of the remaining allegations contained in this paragraph, and therefore the allegations are deemed denied.

330. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

331. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

332. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

333. Renrets admits that the partially quoted language in this paragraph is contained in the document cited. Renrets is without sufficient knowledge to form a belief as to the truth of the remaining allegations contained in this paragraph, and therefore the allegations are deemed denied.

334. Renrets admits that the partially quoted language in this paragraph is contained in the document cited. Renrets is without sufficient knowledge to form a belief as to the truth of the remaining allegations contained in this paragraph, and therefore the allegations are deemed denied.

335. Renrets admits that the partially quoted language in this paragraph is contained in the document cited. Renrets is without sufficient knowledge to form a

belief as to the truth of the remaining allegations contained in this paragraph, and therefore the allegations are deemed denied.

336. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

337. Renrets admits that the documents referenced in this paragraph contain non-competition provisions but denies the characterization of the documents. Renrets is without sufficient knowledge to form a belief as to the truth of the remaining allegations contained in this paragraph, and therefore the allegations are deemed denied.

338. Renrets admits that the partially quoted language in this paragraph is contained in the document cited. Renrets is without sufficient knowledge to form a belief as to the truth of the remaining allegations contained in this paragraph, and therefore the allegations are deemed denied.

339. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

340. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

341. Renrets admits that the partially quoted language in this paragraph is contained in the document cited but denies the characterization of the language.

Renrets is without sufficient knowledge to form a belief as to the truth of the remaining allegations contained in this paragraph, and therefore the allegations are deemed denied.

342. Renrets admits that the partially quoted language in this paragraph is contained in the document cited but denies the characterization of the language. Renrets is without sufficient knowledge to form a belief as to the truth of the remaining allegations contained in this paragraph, and therefore the allegations are deemed denied.

343. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

344. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

345. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

346. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

347. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

348. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

349. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

350. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

351. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

352. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

353. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

354. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

355. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

356. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

357. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph as Renrets does not have knowledge as to the documents' accuracy or veracity, and therefore Renrets denies the allegations in this paragraph.

358. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph as Renrets does not have knowledge as to the documents' accuracy or veracity, and therefore Renrets denies the allegations in this paragraph.

359. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph as Renrets does not have knowledge as to the documents' accuracy or veracity, and therefore Renrets denies the allegations in this paragraph.

360. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

361. Renrets admits that the cited document purports to show an email from Mr. Watson. Renrets is without sufficient knowledge to form a belief as to the truth of the remaining allegations contained in this paragraph, and therefore the allegations are deemed denied.

362. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

363. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

364. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

365. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

366. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

367. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

368. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

369. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

370. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

371. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

372. Renrets is without sufficient knowledge to form a belief as to the truth of the remaining allegations contained in this paragraph, and therefore the allegations are deemed denied.

373. Renrets admits that the cited documents purport to show that certain assets have been placed under the control of a court-appointed receiver but denies the characterization of such. Renrets is without sufficient knowledge to form a belief

as to the truth of the remaining allegations contained in this paragraph, and therefore the allegations are deemed denied.

374. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

375. This paragraph does not contain any allegations, to the extent a response is required, the statement in this paragraph is deemed denied.

**COUNT I**  
**RICO Enterprise**  
**In Violation of RICO 18 U.S.C. §§ 1962(a), (b), (c), (d)**

376. Renrets incorporates each answer in the preceding paragraphs as if set forth fully herein.

377. This paragraph contains conclusions of law to which no response is required. To the extent an answer is required, those conclusions are denied.

378. This paragraph contains conclusions of law to which no response is required. To the extent an answer is required, those conclusions are denied.

379. This paragraph contains conclusions of law to which no response is required. To the extent an answer is required, those conclusions are denied.

380. This paragraph contains conclusions of law to which no response is required. To the extent an answer is required, those conclusions are denied.

381. This paragraph contains conclusions of law to which no response is required. To the extent an answer is required, those conclusions are denied.

382. Denied.

383. Denied.

384. Denied.

385. Denied.

386. Denied.

387. Renrets admits that the partially quoted language in this paragraph is contained in the case cited but denies the characterization of the case. Renrets denies the remaining allegations.

388. Denied.

389. Denied.

390. Denied.

391. Denied.

392. Denied.

393. Denied.

394. Denied.

395. Denied.

396. Denied.

397. This paragraph contains conclusions of law to which no response is required. To the extent an answer is required, those conclusions are denied.

398. This paragraph contains conclusions of law to which no response is required. To the extent an answer is required, those conclusions are denied.

399. Denied.

400. Denied.

401. Denied.

402. Denied.

403. Denied.

404. Denied.

405. Denied.

406. Denied.

407. Denied.

408. Denied.

409. This paragraph contains conclusions of law to which no response is required. To the extent an answer is required, those conclusions are denied.

410. This paragraph contains conclusions of law to which no response is required. To the extent an answer is required, those conclusions are denied.

411. This paragraph contains conclusions of law to which no response is required. To the extent an answer is required, those conclusions are denied.

412. This paragraph contains conclusions of law to which no response is required. To the extent an answer is required, those conclusions are denied.

413. Denied.

414. Denied.

415. Denied.

416. Denied.

417. Denied.

418. This paragraph contains conclusions of law to which no response is required. To the extent an answer is required, those conclusions are denied.

419. This paragraph contains conclusions of law to which no response is required. To the extent an answer is required, those conclusions are denied.

420. This paragraph contains conclusions of law to which no response is required. To the extent an answer is required, those conclusions are denied.

421. Denied.

422. Denied.

423. Denied.

424. Denied.

425. Denied.

426. Denied.

427. Denied.

428. This paragraph contains conclusions of law to which no response is required. To the extent an answer is required, those conclusions are denied.

429. This paragraph contains conclusions of law to which no response is required. To the extent an answer is required, those conclusions are denied.

430. Denied.

431. Denied.

432. Denied.

433. Denied.

434. Denied.

435. Denied.

436. Denied.

437. Denied.

438. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in these paragraphs, and therefore the allegations are deemed denied.

439. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in these paragraphs, and therefore the allegations are deemed denied.

440. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in these paragraphs, and therefore the allegations are deemed denied.

441. Denied.

442. Denied.

443. Denied.

444. Denied.

445. Denied.

446. Denied.

447. Denied.

448. Denied.

449. Denied.

450. Denied.

451. Denied.

**COUNT II**  
**Detinue Pursuant to Va. Code § 8.01-114**

452. Renrets incorporates each answer in the preceding paragraphs as if set forth fully herein.

453. This paragraph contains conclusions of law to which no response is required. To the extent an answer is required, those conclusions are denied.

454. Renrets admits that the partially quoted language in this paragraph is contained in the case they cited but denies the characterization of the case. Renrets denies the remaining allegations.

455. Renrets admits that the partially quoted language in this paragraph is contained in the case cited but denies the characterization of the case. Renrets denies the remaining allegations.

456. Denied.

457. Denied.

458. Denied.

459. Denied.

460. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in these paragraphs, and therefore the allegations are deemed denied.

461. Denied.

462. Denied.

463. Denied.

464. Denied.

465. Denied.

**COUNT III**  
**Fraud**

466. Renrets incorporates each answer in the preceding paragraphs as if set forth fully herein.

467. This count does not apply to Renrets; thus, no response is required. To the extent an answer is required, the allegations in this paragraph are deemed denied.

468. Renrets admits that the partially quoted language in this paragraph is contained in the case cited but denies the characterization of the case. Renrets denies the remaining allegations.

469. Renrets admits that the partially quoted language in this paragraph is contained in the case cited but denies the characterization of the case. Renrets denies the remaining allegations.

470. This count does not apply to Renrets; thus, no answer is required. To the extent an answer is required, the allegations in this paragraph are deemed denied.

471. This count does not apply to Renrets; thus, no answer is required. To the extent an answer is required, the allegations in this paragraph are deemed denied.

472. This count does not apply to Renrets; thus, no answer is required. To the extent an answer is required, the allegations in this paragraph are deemed denied.

473. This count does not apply to Renrets; thus, no answer is required. To the extent an answer is required, the allegations in this paragraph are deemed denied.

474. This count does not apply to Renrets; thus, no answer is required. To the extent an answer is required, the allegations in this paragraph are deemed denied.

475. This count does not apply to Renrets; thus, no answer is required. To the extent an answer is required, the allegations in this paragraph are deemed denied.

476. This count does not apply to Renrets; thus, no answer is required. To the extent an answer is required, the allegations in this paragraph are deemed denied.

477. This count does not apply to Renrets; thus, no answer is required. To the extent an answer is required, the allegations in this paragraph are deemed denied.

478. This count does not apply to Renrets; thus, no answer is required. To the extent an answer is required, the allegations in this paragraph are deemed denied.

479. This count does not apply to Renrets; thus, no answer is required. To the extent an answer is required, the allegations in this paragraph are deemed denied.

480. This count does not apply to Renrets; thus, no answer is required. To the extent an answer is required, the allegations in this paragraph are deemed denied.

481. This count does not apply to Renrets; thus, no answer is required. To the extent an answer is required, the allegations in this paragraph are deemed denied.

482. This count does not apply to Renrets; thus, no answer is required. To the extent an answer is required, the allegations in this paragraph are deemed denied.

483. This count does not apply to Renrets; thus, no answer is required. To the extent an answer is required, the allegations in this paragraph are deemed denied.

484. This count does not apply to Renrets; thus, no answer is required. To the extent an answer is required, the allegations in this paragraph are deemed denied.

485. This count does not apply to Renrets; thus, no answer is required. To the extent an answer is required, the allegations in this paragraph are deemed denied.

486. This count does not apply to Renrets; thus, no answer is required. To the extent an answer is required, the allegations in this paragraph are deemed denied.

487. This count does not apply to Renrets; thus, no answer is required. To the extent an answer is required, the allegations in this paragraph are deemed denied.

488. This count does not apply to Renrets; thus, no answer is required. To the extent an answer is required, the allegations in this paragraph are deemed denied.

489. This count does not apply to Renrets; thus, no answer is required. To the extent an answer is required, the allegations in this paragraph are deemed denied.

490. This count does not apply to Renrets; thus, no answer is required. To the extent an answer is required, the allegations in this paragraph are deemed denied.

491. This count does not apply to Renrets; thus, no answer is required. To the extent an answer is required, the allegations in this paragraph are deemed denied.

492. This count does not apply to Renrets; thus, no answer is required. To the extent an answer is required, the allegations in this paragraph are deemed denied.

493. This count does not apply to Renrets; thus, no answer is required. To the extent an answer is required, the allegations in this paragraph are deemed denied.

494. This count does not apply to Renrets; thus, no answer is required. To the extent an answer is required, the allegations in this paragraph are deemed denied.

495. This count does not apply to Renrets; thus, no answer is required. To the extent an answer is required, the allegations in this paragraph are deemed denied.

496. This count does not apply to Renrets; thus, no answer is required. To the extent an answer is required, the allegations in this paragraph are deemed denied.

497. This count does not apply to Renrets; thus, no answer is required. To the extent an answer is required, the allegations in this paragraph are deemed denied.

498. This count does not apply to Renrets; thus, no answer is required. To the extent an answer is required, the allegations in this paragraph are deemed denied.

499. This count does not apply to Renrets; thus, no answer is required. To the extent an answer is required, the allegations in this paragraph are deemed denied.

500. This count does not apply to Renrets; thus, no answer is required. To the extent an answer is required, the allegations in this paragraph are deemed denied.

501. This count does not apply to Renrets; thus, no answer is required. To the extent an answer is required, the allegations in this paragraph are deemed denied.

**COUNT IV**  
**Tortious Interference with Contractual and/or Business Relations**

502. Renrets incorporates each answer in the preceding paragraphs as if set forth fully herein.

503. This count does not apply to Renrets; thus, no response is required. To the extent an answer is required, the allegations in this paragraph are deemed denied.

504. Renrets admits that the partially quoted language in this paragraph is contained in the case cited but denies the characterization of the case. Renrets denies the remaining allegations.

505. This count does not apply to Renrets; thus, no answer is required. To the extent an answer is required, the allegations in this paragraph are deemed denied.

506. This count does not apply to Renrets; thus, no answer is required. To the extent an answer is required, the allegations in this paragraph are deemed denied.

507. This count does not apply to Renrets; thus, no answer is required. To the extent an answer is required, the allegations in this paragraph are deemed denied.

508. This count does not apply to Renrets; thus, no answer is required. To the extent an answer is required, the allegations in this paragraph are deemed denied.

509. This count does not apply to Renrets; thus, no answer is required. To the extent an answer is required, the allegations in this paragraph are deemed denied.

510. This count does not apply to Renrets; thus, no answer is required. To the extent an answer is required, the allegations in this paragraph are deemed denied.

**COUNT V**  
**Civil Conspiracy**

511. Renrets incorporates each answer in the preceding paragraphs as if set forth fully herein.

512. This paragraph contains conclusions of law to which no response is required. To the extent an answer is required, those conclusions are denied.

513. Renrets admits that the partially quoted language in this paragraph is contained in the case and statute cited but denies the characterization of the case and statute. Renrets denies the remaining allegations.

514. Renrets admits that the partially quoted language in this paragraph is contained in the case cited but denies the characterization of the case. Renrets denies the remaining allegations.

515. Denied.

516. Denied.

517. Denied.

518. Denied.

519. Denied.

**COUNT VI**  
**Breach of Contract**

520. Renrets incorporates each answer in the preceding paragraphs as if set forth fully herein.

521. This count does not apply to Renrets; thus, no answer is required. To the extent an answer is required, the allegations in this paragraph are deemed denied.

522. Renrets admits that the partially quoted language in this paragraph is contained in the case cited but denies the characterization of the case. Renrets denies the remaining allegations.

523. Renrets admits that the partially quoted language in this paragraph is contained in the case cited but denies the characterization of the case. Renrets denies the remaining allegations.

524. This count does not apply to Renrets; thus, no answer is required. To the extent an answer is required, the allegations in this paragraph are deemed denied.

525. This count does not apply to Renrets; thus, no answer is required. To the extent an answer is required, the allegations in this paragraph are deemed denied.

526. This count does not apply to Renrets; thus, no answer is required. To the extent an answer is required, the allegations in this paragraph are deemed denied.

527. This count does not apply to Renrets; thus, no answer is required. To the extent an answer is required, the allegations in this paragraph are deemed denied.

528. This count does not apply to Renrets; thus, no answer is required. To the extent an answer is required, the allegations in this paragraph are deemed denied.

529. This count does not apply to Renrets; thus, no answer is required. To the extent an answer is required, the allegations in this paragraph are deemed denied.

**COUNT VII**  
**Unjust Enrichment and Constructive Trust**

530. Renrets incorporates each answer in the preceding paragraphs as if set forth fully herein.

531. This paragraph contains conclusions of law to which no response is required. To the extent an answer is required, those conclusions are denied.

532. Renrets admits that the partially quoted language in this paragraph is contained in the case cited but denies the characterization of the case. Renrets denies the remaining allegations.

533. Renrets admits that the partially quoted language in this paragraph is contained in the case cited but denies the characterization of the case. Renrets denies the remaining allegations.

534. Denied.

535. Denied.

536. Denied.

537. Denied.

538. Denied.

539. Denied.

540. Denied.

541. Denied.

542. Denied.

543. Denied.

544. Denied.

545. Denied.

546. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

547. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

548. Denied.

549. Denied.

550. Denied.

551. Denied.

**COUNT VIII**  
**Conversion and Constructive Trust**

552. Renrets incorporates each answer in the preceding paragraphs as if set forth fully herein.

553. This paragraph contains conclusions of law to which no response is required. To the extent an answer is required, those conclusions are denied.

554. Renrets admits that the partially quoted language in this paragraph is contained in the case cited but denies the characterization of the case. Renrets denies the remaining allegations.

555. Renrets admits that the partially quoted language in this paragraph is contained in the case cited but denies the characterization of the case. Renrets denies the remaining allegations.

556. Denied.

557. Denied.

558. Denied.

559. Denied.

560. Renrets is without sufficient knowledge to form a belief as to the truth of the allegations contained in this paragraph, and therefore the allegations are deemed denied.

561. Denied.

562. Denied.

#### **PRAYER FOR RELIEF**

WHEREFORE, Defendant Renrets, LLC, denies that Plaintiffs are entitled to any of the relief requested in this section and respectfully requests that the court dismiss the Third Amended Complaint in its entirety and enter judgment in Renrets, LLC's favor and against Plaintiffs.

#### **DEFENDANT RENRETS, LLC'S AFFIRMATIVE DEFENSES**

Defendant Renrets, LLC, asserts the following affirmative defenses, reserving the right to assert additional defenses when and where they become appropriate.

1. Plaintiffs' claims are barred in whole or in part by the doctrine of unclean hands, release, estoppel, delay, laches, ratification, assumption, and/or waiver.

2. Plaintiffs' claims fail in whole or in part by Plaintiffs' failure to state a claim upon which relief may be granted.

3. Plaintiffs' alleged damages were not caused by an alleged act or omission of Renrets.

4. If Plaintiffs sustained any injury or incurred any loss or damages as alleged in the Third Amended Complaint, the same were caused in whole or in part by acts or omissions of another or others over whom Renrets is not responsible, and whose conduct Renrets had no duty or reason to anticipate or control.

5. Plaintiffs' claims are barred in whole or in part by the economic loss rule.

6. Plaintiffs' claims are barred in whole or in part by the statute of limitations.

7. Plaintiffs' claims are barred because Plaintiffs have suffered no injuries or damages as a result of the alleged wrongdoing.

8. Plaintiffs' RICO claim is barred because Plaintiffs failed to allege sufficient factual allegations to state a claim that Renrets was part of an "enterprise" as required in order to sufficiently plead a civil RICO claim.

9. Plaintiffs' claims are barred in whole or in part because any damages were caused by Plaintiffs' own actions.

10. Plaintiffs failed to mitigate its alleged damages, and as such, Plaintiffs' recovery in this matter, if any, must be offset due to its failure to mitigate.

11. Plaintiffs' claims are barred because at all times relevant to the matters alleged in the operative complaint, Renrets acted in good faith and in a reasonable manner, relying upon the representations and advice of counsel, Mr. Atherton.

Dated: August 31, 2022

Respectfully submitted,

/s/ Jared J. Roberts

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Lindsay R. McKasson, VSB No. 96074  
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lindsay@bennall.com

*Counsel for Defendant Renrets LLC*

**CERTIFICATE OF SERVICE**

I certify that on August 31, 2022, a copy of the foregoing was filed with the Clerk of the Court using the Court's CM/ECF system, which will send a copy to all counsel of record.

/s/ Jared J. Roberts  
Jared J. Roberts

*Counsel for Defendant Renrets LLC*